IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Civil Division

Ilya Braude	*	
	*	
Plaintiff	*	**Case No. ________________**
	*	
v.	*	
	*	
Alla Vilnyanskaya	*	
	*	
Defendant	*	

PLAINTIFF'S EX PARTE MOTION FOR A PROTECTIVE ORDER

Plaintiff Ilya Braude, pursuant to Fed. R. Civ. P. 5.2(e)(1), moves the Court ex parte for a Protective Order giving him permission to redact his address from the Complaint to prevent the disclosure of Plaintiff's address to the Defendant. In support of his claims, Plaintiff avers the following:

1. This defamation case arises from Defendant's publication of false accusation that Plaintiff sexually assaulted Defendant.

2. Defendant's defamatory communications are Defendant's most recent attempt to harass and cause harm to Plaintiff and his family.

3. Defendant has harassed Plaintiff and his family on a nearly continuous basis since the romantic relationship between the parties ended in 2009.

4. Plaintiff believes that disclosure of his home address in court documents will result in Defendant causing harm to him or his family or otherwise disturbing the peace.

WHEREFORE, for the reasons set for in the memorandum of law in support of this motion, Plaintiff respectfully requests that the Court enter an order allowing Plaintiff to file the complaint with his home address redacted from the caption.

Respectfully submitted,

ROBSON & ROBSON P.C.

By: /s/
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